



Australian Government

Australian Public Service Commission

# **APS Conflict of Interest Management Framework: Better Practice Model**



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# APS Conflict of Interest Management Framework: Better Practice Model

The Better Practice Model establishes tangible and practical requirements for managing conflict of interest across the APS.

The Model was developed in response to recommendation 14 of the APS Integrity Taskforce's report [Louder than Words: An integrity action plan](#) and has been endorsed by the Secretaries Board and Chief Operating Officers' Committee.

The Model recognises that the effective management of conflict of interest is fundamental to maintaining trust in the integrity of the APS. Taking steps to avoid, declare, and manage conflicts of interest provides assurance to the Australian community, the Government, and the Parliament that public servants will not prioritise their personal interests over their public and official obligations.

The Model supports the effective management of conflict of interest across the APS by providing operational guidance and practical information to enable agencies to implement conflict of interest processes and policy arrangements that are tailored to their needs, responsibilities, and risk profile.

All APS agencies are expected to adopt the Model as a core element of their efforts to strengthen their integrity framework. The Australian Public Service Commission does not require agencies to report on their compliance with the Model, but may consider an agency's maturity and capability against the framework as part of its evaluation or review functions.

The Better Practice Model sets out expected practice across three maturity tiers, and outlines policy settings for each:

**Minimum Requirements** – Benchmarks that illustrate what every APS agency needs to include in their conflict of interest policy.

**Good Practice** – What agencies can do in each category to enhance their policies, systems and processes, and strengthen capability to identify and manage conflicts of interest.

**Excellent Practice** – Stretch goals for agencies that would ensure a mature, strategic and proactive approach to the management of conflicts of interest.

## Application

This Better Practice Model applies to all APS agencies in managing conflicts of interest relating to their employees (and contractors employed as staff). In implementing the Model to uphold integrity, agencies should meet minimum requirements or higher expectations, in the context of agency risk appetite and portfolio responsibilities, by establishing the following:

- Clear **policy and process** guidance that applies internally, including management of conflicts of interest arising in the context of previous employment, secondary (outside) employment and post-separation employment.
- Regular, **scenario-based training** and guidance for staff at all levels on how to identify, declare and, most importantly, manage and monitor conflicts of interest.
- **Central recording** of conflict declarations and management plans by agency employees, with **monitoring and assurance processes** in place.

## Other Guidance

The Model is complemented by and integrates with other conflict of interest guidance:

- **Managing Conflict of Interest and Confidentiality: Resource Management Guide 208** (Department of Finance) to support agencies and officials to manage conflicts of interest and confidentiality arrangements when engaging with the non-government sector, in accordance with their obligations under the *Public Governance, Performance and Accountability Act 2013* framework
- **Conflicts of Interest and Corrupt Conduct: A Guide for Public Officials** (National Anti-Corruption Commission) which offers practical advice to Commonwealth public officials on managing conflicts of interest to reduce the risk of corrupt conduct, as defined in the *National Anti-Corruption Commission Act 2023*.

Together, these three resources promote a unified, principles-based risk-assessment approach to conflict of interest management in the Commonwealth public sector, offering:

- consistent definitions and language
- a standard methodology for identifying and managing conflicts of interest.
- a framework for navigating complex or discretionary situations
- a structured basis for decision-making.

## Key focus areas

In implementing the Model, agency policies, systems and processes should focus on:

- Consideration of conflicts of interest arising from:
  - Previous employment
  - Secondary (Outside) employment
  - Post-separation employment
  - High-conflict risk activities
  - Competing official duties
  - Other agency operations
- Declaration and management plan requirements for employees
  - identification of material personal interests

- assessing risk of real or apparent conflicts between personal interests and public or official duties
- conflict mitigation or management strategies
- Scenario-based training for employees
- Centralised recordkeeping
- Monitoring, reporting and other assurance activities
- Oversight responsibilities.

The APSC has developed a dedicated suite of guidance materials, templates and other resources to support the Model and enable its implementation. These supplementary resources are designed to minimise barriers to adoption of the Model and reduce duplication of effort across the APS, thereby maximising efficiencies and productivity.

## Terminology

### ‘Activity-based conflict of interest’

Conflicts of interest relating to specific high-conflict risk activities undertaken by APS employees within an agency. Activity-based conflicts may arise from personal interests that have already been identified and declared by APS employees on a general or routine basis, or may arise in the specific context of the activity. Activity-based conflicts are specific to that activity and may not be related to an employee’s general duties.

**Note** – The Better Practice Model relates to general conflict of interest declarations and does not detail expectations for the management of activity-based conflicts. However, the principles outlined in this model are applicable across all activity-based conflict of interest considerations and processes.

Further information on specific activities, and relevant conflict of interest management and other integrity requirements which may apply, can be found in the following resources:

**Procurement** – Department of Finance [Ethics and Probity in Procurement](#)

**Grants** – Department of Finance guidance on [Commonwealth grants](#) including the [Commonwealth Grant Rules and Principles](#)

**Contract management** – Department of Finance guidance on [Contract Management](#) and the [Ethical Conduct of Suppliers](#)

**Policy consultation with external entities** – Department of Finance guidance on the [Management Advisory Services Panel](#)

**Regulatory activity** – Department of Finance guidance on [Regulator Performance](#)

**Recruitment** – Australian Public Service Commission’s [Recruitment Guidelines](#) and [Factsheet: Managing conflict of interest in recruitment](#)

**Investigations** – Australian Federal Police guidance on the [Australian Government Investigations Standard](#) and the Australian Public Service Commission's [Handling Misconduct - A human resource manager's guide](#)

## ‘Central recording’

Agencies are to keep centralised records of conflict of interest declarations and management plans in reliable ICT recordkeeping systems, either in dedicated applications or in manual formats (e.g. spreadsheets), that include:

- General and annual conflict of interest declarations for individual APS employees (including SES)
- Activity-based conflict declarations for individuals
- Agency conflicts with external entities, and
- Approved management plans.

The functionality available for centrally recorded conflicts of interest arrangements will differ across agencies—including what data can be captured, access levels, and monitoring and assurance or reporting capability—and will be dependent on the features and capability of the recording method (for example, the capability of existing or future IT solutions).

## ‘Personal conflict of interest’

A personal conflict of interest exists when a public official or other person has a personal interest, or another duty, that could affect or be affected by how the public official or person performs their public or official functions or duties.

A material personal interest can be financial or non-financial, and can include competing duties. To be ‘material’, a personal interest needs to be of a type that can sensibly give rise to a real or apparent conflict of interest. Examples may include family, friendship, financial interests, volunteer work, political affiliations/associations, previous employment or social relationships.

- A **real conflict of interest** exists where you have a personal interest or competing duty that could affect or be affected by the way you perform your public or official functions or duties.
- An **apparent conflict of interest** exists where a **reasonable person** might think that you have a personal interest, relationship or competing duty that could affect, or be affected by, the way you perform your public or official functions or duties, even though there is no real conflict of interest.

The appearance of a conflict can be just as damaging to public confidence in the integrity of the APS as an actual conflict.

## ‘Agency conflict of interest’

A conflict of interest that could call into question the independent decision-making of an agency (rather than an individual employee) due to a relationship with an external organisation or individual.

When determining whether an agency conflict of interest exists, agencies should consider whether:

- the agency is in a contractual relationship with the organisation
- the organisation has received or is likely to receive financial assistance from the Commonwealth
- the organisation's primary role is to lobby ministers or Government
- the organisation is regulated by the agency, or by another government agency
- engagement with the organisation would otherwise present a real or apparent conflict of interest
- the agency's independent decision-making may be—or may reasonably be perceived to be—affected by the conflict of interest.

Agency conflicts of interest should be declared and mitigated as part of a general or activity-based conflict of interest declaration and management process. Where employees consider that there may be an agency conflict of interest, this should be discussed with the appropriate management.



# Conflict of Interest policy and process

A conflict of interest policy sets out an agency's declaration and management processes and education requirements in the context of its responsibilities, risk profile, and size. Employees should be able to read their agency's policy and understand what a conflict of interest is, how to make a declaration, and how to put in place effective management strategies.

Agency policies should explain employees' obligations under the [APS Code of Conduct](#) in the [Public Service Act 1999](#) and their duties as officials under the [Public Governance, Performance and Accountability Act 2013](#) in relation to conflict of interest. They should also explain that effective conflict of interest management can prevent corrupt conduct as defined in the [National Anti-Corruption Commission Act 2023](#). Policies should set out potential consequences for failing to meet these obligations. Policies must also include guidance about high-conflict risk areas of the APS employment 'lifecycle', such as previous employment, secondary (outside) employment and post-separation employment. They must also outline how employees with management responsibilities should assess risk and determine appropriate mitigation strategies with staff.

## Minimum requirements

**Declarations** – All conflict of interest declarations must detail the type and extent of the interest being declared. The nature of the conflict must be evident from the detail provided. Declarations are centrally recorded in official agency recordkeeping systems.

- **APS and EL** – Declarations are made at onboarding, and where there is a change in circumstances or a new conflict arises. New conflict of interest declarations are also required for all high-conflict risk activities. Consideration should be given to any agency conflicts identified in activity-based declarations (for example, an employee's ordinary duties with respect to an existing supplier may give rise to an agency conflict during a procurement activity if the supplier is expected to participate). If the employee works in a high-conflict risk area on a day-to-day basis, such as a procurement team, a grants hub, or integrity team; or in an agency with a higher risk profile, such as a regulatory or an integrity agency, they may be required to complete annual declarations.
- **SES (and acting SES longer than 3 months)** – Declarations are made at onboarding for substantive SES and when a period of acting in an SES role will exceed three months (including extensions). Substantive SES employees must complete annual conflict of interest declarations, and must complete additional declarations where there is a change in circumstance or a new conflict arises. New conflict of interest declarations are also required for all high-conflict risk activities (for example, when participating on a recruitment or procurement selection panel). Annual declarations can be confirmed and rolled over from year to year, if there has been no change in circumstances or interests. Consideration should be given to any agency conflicts identified in activity-based declarations.

- **All employees (SES and non-SES) with statutory or professional obligations –**  
Declarations are made at onboarding and either annually or as required in accordance with relevant legislation or the rules which apply to those professions.

**Management Plans** – An employee's direct manager or appropriate activity personnel (e.g. a selection panel chair) must be informed of any conflict of interest declaration and is responsible for deciding the appropriate management plan for the interest declared, in line with agency policies.

Decisions regarding management plans must be documented and explained, including when it is determined that no further action is needed. The direct manager, or appropriate activity personnel, must acknowledge that they have read and understood the declaration, and that they are satisfied with the management plan or the decision not to implement a management plan. Management plans should clearly outline the obligations and expectations of the employee making the declaration, and outline what they are required to do to avoid or mitigate the conflict.

When an employee moves between teams in the same agency, the employee should inform their new direct manager of any existing conflict of interest declarations and management plans.

All declarations and management plans for SES and staff with statutory/professional responsibilities must be reviewed annually. All reviews should assess the ongoing suitability of the management plan; and must be documented. The review must be stored in agency record keeping systems and linked to the original declaration.

**Note** – Where a conflict cannot be appropriately mitigated, reasonable steps must be taken to completely avoid the conflict of interest.

**Previous employment (includes volunteer work, business ownership and contract work prior to APS employment)** – Employees must identify any real or apparent conflicts of interest related to their previous employment (at least in the past 2 years) and complete a declaration and management plan as part of or in addition to onboarding processes. Direct managers must be aware of any conflicts of interest related to previous employment, and new managers must be informed when the employee changes roles. Staff should be prompted to consider renewing conflict of interest declarations when moving to new roles or duties within an agency.

**Secondary (outside) employment (includes volunteer work, business ownership and contract work outside of the agency)** – Employees must notify their supervisor of any secondary or outside employment. Where a conflict exists, or where an employee's duties involve confidential, sensitive or classified information, a declaration and management plan must be submitted for supervisor approval. Consideration should be given to whether there are any conflicts of interest between the organisation of outside employment and the agency. Employees are responsible for advising their supervisor if their secondary employment ceases. Managers are responsible for working with employees to establish management plans as needed, and ensuring approved management plans are properly recorded in centralised agency recordkeeping systems.

**Post-separation** – All staff exit forms must include confidentiality and conflict of interest declaration templates. Employees must provide a written confidentiality declaration and a conflict of interest declaration prior to separation from the APS where a potential post-separation conflict exists. Agency policies should include information on all legislative obligations of confidentiality, secrecy or the avoidance of conflict of interest that may apply post-separation (noting that non-SES and SES employees, agency heads and statutory office holders may have different obligations), including under the *Criminal Code Act 1995*, *Foreign Influence Transparency Scheme Act 2018*, Lobbying Code of Conduct or other portfolio legislation, where relevant. SES are sent internal correspondence explaining their specific post-separation integrity obligations before their separation from the APS.

## Good practice

**Declarations** – As per minimum requirements, **plus** all conflict of interest declarations must also detail how the declared personal interest relates to the functions of the agency, and demonstrate that consideration has been given to potential impacts on the agency.

- **APS and EL** – After initial declaration for all staff upon commencement, a documented risk management approach is taken to inform ongoing requirements to declare conflicts of interest. If the employee belongs to a high-conflict risk area or holds a high-conflict risk position, they must complete annual declarations. Employees must also complete activity-based declarations as needed.
- **SES (and acting SES longer than 3 months)** – In addition to minimum requirements, an annual declaration can only be rolled over on two occasions (a new declaration is required to be completed and signed after two roll-overs).
- **All employees (SES and non SES) with statutory/professional obligations** – As per minimum requirements.

**Management Plans** – As per minimum requirements, **plus** manager above supervisor must review all declarations and management plans in place for their team annually. When an employee moves between teams within the same agency, the previous supervisor and the employee are to inform the new supervisor of any existing conflict of interest declarations and management plans.

**Secondary (outside) employment** – As per minimum requirements, **plus** manager above supervisor approval is required prior to engaging in outside employment. A conflict of interest declaration and management plan must be submitted with the request for manager approval, regardless of whether a conflict exists, and recorded, with the manager's decision, in centralised agency recordkeeping systems. No ongoing review requirement unless there is a future change in circumstance. Consideration must be given to whether there are any agency conflicts of interest with the outside employing organisation.

**Previous employment** – As per minimum requirements, **plus** a requirement to document whether or not a conflict linked to previous employment (past 2 years) exists as part of onboarding declaration requirements (the minimum requirement only requires documentation where a real or apparent conflict does exist).

**Post separation** – As per minimum requirements, **plus** an exit letter is provided to SES employees prior to separation and copies sent to their new employer (if known) where a potential conflict is declared that needs appropriate consideration. The letter must include

information about legislative obligations under the Criminal Code Act, Lobbying Code of Conduct, FITS Act and any other confidentiality and secrecy obligations that apply to the employee post-separation. SES are to acknowledge receipt of this information in writing before separation, and records must be kept in centralised agency recordkeeping systems. Where a conflict of interest risk with the employee's new employer is identified, supervisors are to consider reasonable mitigation or management steps during the period prior to final separation (such as altering duties, granting leave or removing access to sensitive information/systems).

## Excellent practice

**Declarations** – As per good practice.

- **APS and EL** – As per good practice, **plus** mandatory annual conflict of interest declarations for all staff are expressly linked to the performance management framework for employees.
- **SES** – As per good practice, **plus** when SES change roles, conflict of interest declarations are updated. Mandatory annual declarations are expressly linked to the performance management framework. Annual declaration roll-overs must not occur, and a new declaration must be completed every year.

**Note** – Agencies should consider whether their conflict of interest policy should be tailored to address conflicts that can arise in specific risk areas.

**Management Plans** – As per good practice **plus** periodic recorded touchpoints between the employee and their supervisor, to ensure management plans continue to effectively mitigate the declared interest and are updated as needed.

**Secondary (outside) employment** – As per good practice **plus** a separate agency policy for outside employment (paid and unpaid) is in place to outline employee obligations. Mandatory annual outside employment approval reviews and conflict of interest declarations occur regardless of whether a conflict exists. Declarations should be updated in the instance of a change of circumstances. A letter may be provided to the outside employer specifying the employee's conflict of interest obligations in the APS.

**Previous employment** – As per good practice **plus** supervisors are also responsible for reviewing conflict of interest declaration and management plans periodically as part of the employee's performance management cycle.

**Post separation** – As per good practice **plus** an exit letter as described for SES is provided to **all** employees (non-SES and SES) prior to separation. All employees are to acknowledge receipt of this information in writing before separation, and records must be kept in centralised agency recordkeeping systems. A copy of this letter may also be provided to the individual's new employer (if known), where a conflict risk is identified so that they are also aware of the ongoing obligations. Supervisors are to consider reasonable mitigation or management steps during the notice period prior to final departure (such as altering duties, granting leave or removing access to sensitive information/systems).

# Scenario-based training and guidance

In addition to providing clear policy guidance, agencies support their staff by providing education and training on how to identify, avoid, declare, and manage conflicts of interest. Scenario-based training—either through e-learning modules, interactive virtual sessions, or in-person sessions—is recommended to raise awareness of the conflicts that can arise in the context of different roles, responsibilities, and activities, and build employee and manager confidence and capability to manage conflicts. Areas of focus for training will be different in each agency, and should be tailored to agencies' needs, high-conflict risk activities, and operating context.

## Minimum requirements

**Regularity of training** – Training (e-learning) is conducted as part of induction, and on an annual refresher basis for all staff.

**Note** – High-conflict risk areas or activities may need more regular bespoke conflict of interest training.

**Assessment Requirements** – Training must include an assessment. Wrong answers are explained at the end but there is no 'pass' or 'fail' grade given.

**Scenario-based training** – Training contains scenarios that are relevant to conflict of interest risks specific to the agency.

**Note** – Scenario-based training should be considered for induction, refresher and bespoke training. Agencies should consider including scenarios in their training that are specific to high-risk business areas in the agency, as well as activity-based conflict of interest areas that are common for the agency.

**Assurance** – Supervisors must remind their teams to complete the training, and must provide the next level manager with confirmation once the training is complete each year.

**Further considerations** – Business areas are made aware that they can reach out to the enabling team responsible for agency conflict of interest policy for training or education resources as required.

## Good practice

**Regularity of training** – As per minimum requirements, **plus** staff with supervisory responsibilities are required to complete mandatory annual manager-specific conflict of interest training.

**Note** – High-conflict risk areas are encouraged to conduct refresher training in between the annual requirement (either virtually or face-to-face).

**Assessment Requirements** – Training must include an assessment with a ‘Pass’ or ‘Fail’ grade given. Wrong answers are explained at the end with the requirement to reattempt incorrect answers. There is a limit of three reattempts at passing, and the employee must speak with their supervisor if they are unable to achieve the pass grade.

**Scenario-based training** – As per minimum requirements, **plus** the training covers various levels of complexity. Scenarios will cover both personal and agency conflicts of interest and contain scenarios to illustrate identifying, declaring, managing and monitoring a conflict of interest. Training scenarios are reviewed and updated every two years as part of training module updates (these updates are the responsibility of the agency). Manager-specific training is made available which managers may be required to complete.

**Assurance** – As per minimum requirements, **plus** annual reminders are issued to supervisors on the due date (if system capability allows) indicating training completions, which is then provided to the next level manager (or whoever agency deems appropriate). Alternatively, this list could be compiled manually on an individual team level and reported to the manager.

**Further considerations** – As per minimum requirements **plus** the implementation of biannual drop-in sessions for conflict of interest awareness raising. Agencies can also consider implementing an ‘awareness campaign’, similar to Fraud Awareness Week, in relation to conflict of interest management. Simultaneously or alternatively, conflict of interest management could be incorporated into existing agency integrity awareness campaigns.

## Excellent practice

**Regularity of training** – As per good practice, **plus** training is delivered via in-person or virtual face-to-face engagement.

**Assessment Requirements** – As per good practice **plus** employees are required to achieve a certain percentage of correct answers before being considered to have completed or passed the training. Components of the training are tailored to different classifications or roles to reflect relevant obligations and duties, as well as any changes to the operating environment/risk appetite.

**Scenario-based training** – As per good practice, **plus** scenarios for both general and manager-specific training are updated annually. Components of training are tailored to different classifications or roles to reflect relevant obligations and duties.

**Assurance** – As per good practice **plus** agency systems provide an individual reminder (via email) both prior to and on the due date of training. Agencies can take additional steps, including (but not limited to) the following:

- Once the due date lapses, the next level manager (or whoever the agency deems appropriate) is provided a list to confirm and follow up any staff who have not yet completed the training.
- If a gap in knowledge is identified through the training, this is discussed during the employee’s next one-on-one with their supervisor.
- Managers completing supervisor-specific training must obtain a ‘pass’ result for their assessment.

**Further considerations** – conflict of interest awareness is built into broader integrity education programs with the implementation of conflict of interest training sessions tailored for business areas and certain roles (for example, managers). Scenarios should also reflect organisational experience of failures of conflict of interest being adequately identified and managed. Feedback surveys to gauge staff understanding of conflict of interest matters and practices could feed into additional awareness. Annual reviews of training outcomes could be conducted to identify areas of poor knowledge or awareness, which can then be used to inform further education/training.



# Central recording of conflict declarations and management plans

APS agencies are expected to take steps to ensure that their conflict of interest policies are being appropriately administered and that staff are complying with requirements. Central recordkeeping and oversight assists agencies to identify areas for improvement, using evidence of compliance, concerns, trends and patterns that can be addressed through education and training.

## Minimum requirements

**Recording** – Central recording of general conflict of interest declarations and management plans for all staff. All declarations and management plans must be contained within the one document or appropriately linked.

**Monitoring and assurance** – Annual reminders for all staff to regularly review conflict of interest declarations and management plans, and update them when changes in circumstances occur or new conflicts arise.

**Oversight** – Internal random spot-checks for conflict of interest declaration and management plan records, including rates and frequency of completions, and whether management plans and strategies are appropriate, and are being complied with on an ongoing basis. This must be reviewed by the business area responsible for managing agency conflict of interest policy, with trends (where identified) to be shared across the agency as an opportunity for awareness and training uplift.

**Note** – sample size of spot checks will differ depending on agency size and oversight capability. Agencies may wish to conduct ‘spot-checks’ on employees with no declarations. This will be at the agency’s discretion based on risk appetite and agency capacity.

### Reporting:

- **Individual conflict management concerns** – Reported as per agency’s integrity concern reporting processes.
- **Compliance and trends** – Bi-annual reporting to executive. Wider agency communications not required.

## Good practice

**Recording** – As per minimum requirements **plus** central recording of conflict of interest declarations and management plans for all high-conflict risk activities.

**Monitoring and assurance** – As per minimum requirements, **plus** prompts to review conflict of interest declarations and management plans when an individual moves into a new position (linked to position number), or at specific review points within an activity as applicable. Acting



arrangements to be monitored to identify when a conflict of interest declaration is triggered by an extension of an acting period (such as acting in an SES role).

**Oversight** – As per minimum requirements, **plus** a representative sample of conflict of interest declarations across staff levels and business areas are reviewed annually. Activity-based declarations can be cross-referenced with SES annual declarations and the gifts and benefits register to identify conflict of interest management gaps. Trends are shared across the agency as an opportunity for education uplift.

**Reporting:**

- **Individual conflict management concerns** – As per minimum requirements, **plus** regular agency communications on conduct management outcomes (de-identified or aggregate).
- **Compliance and Trends** – As per minimum requirements, **plus** executive and wider agency communications.

## Excellent practice

**Recording** – As per good practice, **plus** periodic touchpoints for review with the employee and delegate (approver) are recorded in the system (outside of any annual reporting requirements). Staff are required to report each occasion when a conflict of interest is managed in a 'business-as-usual' environment (e.g. service delivery). Conflict of interest declarations, and management plans where appropriate, are built into all case management systems relating to decision-making, including assessor/user and delegate/decision maker.

**Monitoring and assurance** – as per good practice.

**Oversight** – As per good practice **plus** conflict of interest management plans are pressure tested for suitability, findings are shared with relevant business areas, and trends are shared across the agency as an opportunity for education uplift. Agencies may conduct annual reviews of conflict of interest policies with a focus on emerging or changing risks.

**Reporting:**

- **Individual conflict management concerns** – As per good practice **plus** a platform (such as tips inbox/hotline or ICT platform) is made available for staff to raise confidential and anonymous conflict of interest concerns.
- **Compliance and Trends** – As per good practice, **plus** quarterly reporting to executive (including internal boards or committees where appropriate) and wider agency communications.

**Note** – Standards for recording, monitoring and assurance, oversight and reporting will be dependent on individual agencies' systems capability.

# Further Information and Resources

- [Frequently Asked Questions \(FAQ\)](#)
- [Conflict of interest management for new APS employees](#)
- [Conflict of interest obligations during APS employment](#)
- [Activity-based conflict of interest management](#)
- [Secondary \(outside\) employment and conflict of interest](#)
- [Leaving the APS—post-separation conflict of interest](#)
- [Conflict of interest guidance for managers](#)
- [Case studies – Examples of common scenarios, and suggested mitigation strategies and conflict risk controls](#)
  - Conflict of duties
  - Investigations and complaint handling
  - Secondary (outside) employment
  - Internal personal relationships
  - External personal relationships
  - Procurement
  - Grants
  - Commencement
  - Recruitment
- [Model conflict of interest declaration form \(template\) – All APS employees \(SES and non-SES\)](#)
- [Model conflict of interest declaration form \(template\) – Agency Heads and Statutory Office Holders](#)